

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:21-CV-463-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD.,)	
SAMSUNG ELECTRONICS AMERICA,)	
INC., SAMSUNG SEMICONDUCTOR,)	
INC.,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST'S
MOTION TO STRIKE PORTIONS OF THE REBUTTAL EXPERT REPORT
OF PAUL K. MEYER**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Strike Portions of the Rebuttal Expert Report of Paul K. Meyer. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the Expert Rebuttal Report of Paul K. Meyer.

3. Attached as **Exhibit 2** is a true and correct copy of the attachments to the Expert Rebuttal Report of Paul K. Meyer

4. Attached as **Exhibit 3** is a true and correct copy of Samsung’s Seventh Supplemental Objections and Responses to Netlist’s First Set of Interrogatories (Nos. 1, 2, 4, 5, 7, 9).

5. Attached as **Exhibit 4** is a true and correct copy of the JEDEC Manual of Organization and Procedure.

6. Attached as **Exhibit 5** is a true and correct copy of Plaintiff Netlist, Inc.’s Second Supplemental Responses and Objections to Defendants’ First Set of Interrogatories.

7. Attached as **Exhibit 6** is a true and correct copy of Plaintiff Netlist, Inc.’s First Set of Interrogatories To Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., And Samsung Semiconductor, Inc. (Nos. 1–11).

8. Attached as **Exhibit 7** is a true and correct copy of the transcript of the December 14, 2022 deposition of Seung-Mo Jung.

9. Attached as **Exhibit 8** is a true and correct copy of the transcript of the

November 14, 2022 deposition of Kyungsoo Park.

10. Attached as **Exhibit 9** is a true and correct copy of the transcript of the November 23, 2022 deposition of Sungjoo Park.

11. Attached as **Exhibit 10** is a true and correct copy of a June 8, 2022 Letter from Netlist to Samsung pertaining to Rule 408.

12. Attached as **Exhibit 11** is a true and correct copy of Hedonic Prices and Patent Royalties by Gregory Sidak and Jeremy O. Skog.

13. Attached as **Exhibit 12** is a true and correct copy of the December 2, 2022 deposition of Jihwan Kim.

14. Attached as **Exhibit 13** is a true and correct copy of the December 6, 2022 deposition of Hyun Joong “Johnny” Kim.

Executed on February 3, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby